



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*86 Chambers Street
New York, New York 10007*

August 24, 2022

BY ECF

The Honorable Lorna G. Schofield
United States District Judge
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Pro Publica, Inc. v. U.S. Dept. of Health & Human Servs.*, 20 Civ. 4092 (LGS)

Dear Judge Schofield:

I write respectfully on behalf of both parties in the above-referenced FOIA matter to request that the Court's Order regarding document processing, dated September 11, 2020 (Dkt. No. 24), be stayed for a period of sixty days to permit the parties to explore settlement.

On September 11, 2020, the Court ordered defendant the United States Department of Health & Human Services ("HHS") to "process and produce responsive non-exempt documents at a rate of at least 1,000 pages per month." Dkt. No. 24. Accordingly, HHS has been processing and producing such documents each month and has completed twenty-four productions. Recently, the parties began conferring about ways to potentially resolve this matter without further Court intervention. In order to permit the parties time to discuss potential settlement parameters, and to conserve party and Court resources, the parties respectfully request that the Court's September 11, 2020, Order be stayed for a period of sixty days, to October 17, 2022, on which date the parties will provide a status update.

We thank the Court for its consideration of this request.

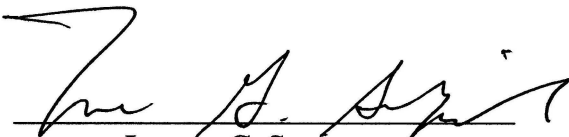
Application GRANTED. Production is STAYED, and HHS will resume production at the prior pace of at least 1,000 pages per month in November 2022. The parties shall file a joint status letter on **October 17, 2022**.

Respectfully,

DAMIAN WILLIAMS
United States Attorney

Dated: August 25, 2022
New York, New York

By: /s/ Ellen Blain
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LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

cc: Paul Safier, Esq.
Counsel for Plaintiff